

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 25-cv-21291 DSL

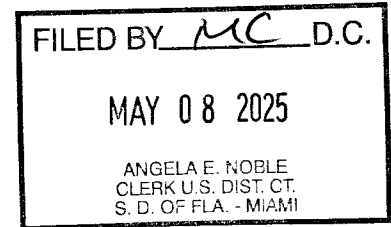
SHELBY MAYES,

Plaintiff,

vs.

J & J GREEN PAPER, INC. AND
MICHAEL SCOTT SEGAL,

Defendants.



DEFENDANTS' ANSWER TO COMPLAINT

Defendants, J & J Green Paper, Inc. and Michael Scott Segal, appearing pro se, respond to Plaintiff's Complaint as follows:

GENERAL DENIAL

Pursuant to Federal Rule of Civil Procedure 8(b)(3), Defendants deny all allegations in the Complaint not specifically admitted herein.

RESPONSES TO INDIVIDUAL PARAGRAPHS

1. Defendants are without knowledge sufficient to admit or deny and therefore deny.
2. Admit that J & J Green Paper, Inc. is a Delaware corporation authorized to do business in Florida and maintains its principal place of business in Miami-Dade County, Florida. Deny all other allegations.
3. Admit that Michael Scott Segal was a shareholder and director of J & J Green Paper, Inc. during the relevant time period. Deny the remaining allegations.
4. Admit.

5. Defendants admit that venue is proper but deny the accuracy of all statements regarding where Plaintiff worked or was due to be paid. Defendants further state that the amount of work performed and wages owed are in dispute.

6. Defendants are without knowledge sufficient to admit or deny and therefore deny.

7. Defendants are without knowledge sufficient to admit or deny and therefore deny.

8. Defendants state that Plaintiff was offered payment by check mailed to the address on file, which she did not cash.

9. Defendants are without knowledge sufficient to admit or deny and therefore deny.

10. Denied. Defendants deny they are an enterprise covered by the Fair Labor Standards Act as alleged.

11. Denied. Defendants do not produce or sell sustainable paper products; they manufacture pellet-based coatings used in packaging applications and do not directly sell or apply coatings to paper.

12. Admit.

13. Denied. Defendants do not engage in e-commerce. The referenced website is informational only and does not facilitate any commercial transactions.

14. Denied. Defendants produce sustainable coating pellets, not paper products.

15. Denied.

16. Denied. Defendants do not operate a sustainable packaging business and do not manufacture or sell paper products.

17. Denied. Plaintiff was a salaried employee.

18. Denied. Plaintiff was an exempt employee who performed professional services and was paid a monthly salary.

19. Admit.

20. Defendants deny the alleged dates of employment. Plaintiff's last day of work was January 7, 2025.

21. Defendants are without knowledge sufficient to admit or deny and therefore deny.

22. Plaintiff's job duties included research into international law and businesses relating to the industry.

23. Denied.

24. Denied. Plaintiff was a salaried, exempt employee and does not meet the definition of non-exempt under the FLSA.

25. Denied. Plaintiff was mailed a check for wages owed for work performed from December 15, 2024 to January 7, 2025, which she refused.

26–28. Denied.

29–33. Denied.

34–39. Denied.

AFFIRMATIVE DEFENSES

1. Failure to State a Claim: Plaintiff fails to state a claim upon which relief can be granted.

2. Exempt Status: Plaintiff was an exempt employee under the FLSA.

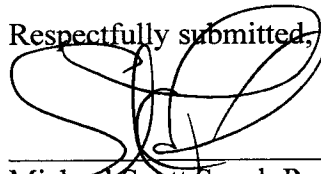
3. Payment Rendered: Defendants paid all compensation due; Plaintiff refused payment.

4. Lack of Jurisdiction Over Individual Defendant: Plaintiff has not pled facts sufficient to hold Michael Scott Segal individually liable.

5. Reservation of Rights: Defendants reserve the right to assert additional defenses as discovery proceeds and counsel is retained.

WHEREFORE, Defendants respectfully request that judgment be entered in their favor, that Plaintiff take nothing by this action, that Defendants be awarded costs as permitted by law, and for such other and further relief as the Court deems just and proper.

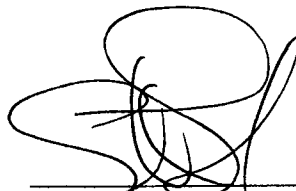
Respectfully submitted,



Michael Scott Segal, Pro Se
On behalf of himself and J & J Green Paper, Inc.
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CERTIFICATE OF SERVICE

On May 8th, 2025, I hand-delivered the Motion for Extension of Time to the Clerk's Office for the Southern District of Florida and provided a copy to counsel of record via email at brian@fairlawattorney.com.



Michael Scott Segal